REMARKS

Applicants request that the Examiner review and formally accept the drawings filed November 19, 2003.

Claim Rejections under 35 U.S.C. § 102(b)

Reconsideration of the rejection of claims 2, 4-7, 14-22, and 26-30 under 35 U.S.C. § 102(b) as being anticipated by WebWasher, as described by Bruce, B., is respectfully requested.

Claim 4

Claim 4 is directed to a method for blocking dereferencing elements in a message, the method comprising:

accepting a source file for the message;
identifying one or more elements within the message source file, wherein the elements specify references to sources of content to be dereferenced upon rendering of the message;
rewriting the references to the sources of content of the elements identified in the message source, wherein the rewriting of the references to the sources of content comprises replacing the reference to the source of content with a reference to an alternate source file;
passing the message source to a message display output; and
rendering the message in the message display.

None of the references of record disclose such a method. To anticipate a claim, each and every element set forth in the claim must be found in a single prior art reference. M.P.E.P. § 2131. But WebWasher, hereinafter described as "Bruce," fails to teach each and every element of this claim.

In particular, claim 4 includes the requirement that the method identify one or more elements within the message source file, wherein the elements specify references to sources of content to be dereferenced upon rendering of the message. This claim element requires that the method **identify dereferencing elements within a message** source file. A dereferencing element is one that is automatically dereferenced by an e-mail client program while rendering the message. When the element is dereferenced by the e-mail client program, the sender of the message can detect the unique information stored in the dereferencing element and identify that a particular recipient has opened the message. This allows the sender to validate the recipient's address, thereby circumventing any read receipt privacy control undertaken by the recipient.

Thus, to anticipate claim 4, the cited reference must identify elements **within the message source** file that will be dereferenced upon rendering the message. Bruce fails to provide such a teaching.

In particular, Bruce fails to identify elements **within the message** source file that will be dereferenced upon rendering the message. Pages 1-23 of Bruce referenced in the Office action deal exclusively with blocking and controlling the placement of **cookies** encountered during **web browsing**. Cookies placed during web browsing are not the same as dereferencing elements included in a message source file. Similarly, pages 24-31 of Bruce referenced in the Office action discuss (i) replacement of a broken image of a web browser, such as replacing an advertisement with a colored image, and (ii) controlling the browser, operating system, and saved favorites information a website typically receives when accessed with a web browser. Replacement of broken images and control of system information displayed during browsing are not the same as dereferencing elements included in a message source file. These portions of Bruce are not applicable to claim 4, as claim 4 applies to blocking dereferencing elements **in a message**, not blocking cookies during **web browsing**. Pages 32 and 33 of Bruce discuss countering e-mail spying by working in an "offline mode," which prohibits the transmission of information to the Internet while reading e-mail. This offline mode, however, does not teach or suggest the novel features of claim 4. Thus, there is no teaching in Bruce for the identifying process claimed in claim 4. As such, Bruce cannot anticipate claim 4.

In addition, Bruce fails to rewrite the references to the sources of content of the elements identified in the message source, wherein the rewriting of the references to the sources of content comprises replacing the reference to the source of content with a reference to an alternate source file. Bruce does disclose replacement of a broken image of a browsed **webpage**, but this provides no teaching for replacing the reference to the source of content of the dereferencing elements **identified in the message source** with a reference to an **alternate source file**. Again, Bruce provides no relevant teaching regarding blocking dereferencing elements in a message via replacing the reference, as required by claim 4. Bruce merely teaches operation in an offline mode, which prohibits transmission of sensitive information, but at a cost of severely limiting the functionality of the system. The method described by claim 4 has no such limited functionality.

In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 4. Claims 2, 5, 6, and 7, which depend directly from claim 4, are submitted as patentable for the same reasons as set forth above with respect to claim 4.

If the Office maintains the rejection of the present claim, Applicants request the courtesy of a phone call to the undersigned at (314) 231-5400.

Claims 17 and 18

Claim 17 is directed to a method for blocking dereferencing elements in a message, the method comprising:

> accepting a source file for the message;
> rendering the file in a first message display output;
> grouping one or more elements within the rendered message into security level groups;
> rewriting the elements to be processed through a protocol handler, wherein the processing of the elements by the protocol handler comprises returning information indicating that a target destination is not available;
> passing the message source to a second message display output; and
> rendering the message in the second message display.

None of the references of record disclose such a method. To anticipate a claim, each and every element set forth in the claim must be found in a single prior art reference. M.P.E.P. § 2131. But Bruce fails to teach each and every element of this claim.

In particular claim 17 requires the **grouping of one or more elements within the rendered message** into security level groups. This grouping of elements of a rendered **message** into security levels is not disclosed in Bruce. Bruce teaches the selective blocking and allowance of cookies associated with a plurality of web pages based upon user-defined criteria. This disclosure has no applicability to claim 17, which is clearly directed to blocking dereferencing elements in a particular **message**, not a plurality of web pages. One skilled in the art would not look to this portion of Bruce for a teaching related to messaging. Again, the present anticipation rejection requires that Bruce teach each and every element, which it clearly does not.

Moreover, the Office's assertion that Bruce's teaching of blocking cookies is akin to the claimed blocking of dereferencing elements in a messaging context is improper. Blocking a cookie is a different matter altogether, requiring that the cookie be blocked from storage on the client's system when a web page is accessed. The present claim, however, deals with a

dereferencing element embedded in a message, not a webpage. Anticipation requires the explicit teaching of each element, and thus Bruce cannot anticipate claim 17.

In addition, the Office's assertion that Bruce "inherently" teaches the elements of claim 17 is not appropriate for an anticipation rejection. In particular, the Office states that "[i]t is inherent in the invention taught by Bruce that a distinction between cookies, etc., to be accepted and those to be redirected or blocked is a grouping of the elements." Applicants strongly disagree with this assertion of inherency. For a reference to anticipate, it must teach each and every element. Here, there is no teaching for grouping and rewriting elements found within a message. In the context of anticipation, Bruce's teaching is limited to blocking cookies received when accessing web pages. Bruce's teaching regarding operation in an offline mode is similarly inapplicable to the anticipation argument. In fact, Bruce teaches away from the present claim when it employs an entirely different browsing protection scheme, namely blocking, than its messaging protection scheme, working offline. Bruce's browsing scheme may not be applied, while ignoring Bruce's clear contrary teaching for handling messaging. Thus, there can be no stretching of the Bruce teaching to anticipate the present claims.

In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 17. Claims 14, 16, and 22, which depend directly from claim 17, are submitted as patentable for the same reasons as set forth above with respect to claim 17.

If the Office maintains the rejection of the present claim, Applicants request the courtesy of a phone call to the undersigned at (314) 231-5400.

Claim 18 is submitted as patentable for the same reasons as set forth above with respect to claim 17. Claims 15 and 19-21, which depend directly from claim 18, are submitted as patentable for the same reasons as set forth above with respect to claim 18.

Claim 26

Claim 26 is directed to a method for blocking dereferencing elements in a message, the method comprising:

  accepting a source file for the message;
  rendering the file in a first message display output;
  grouping one or more elements within the rendered message into security level groups;
  rewriting the elements to be processed through a protocol handler, wherein

the processing of the elements by the protocol handler comprises returning information indicating that a target destination is not available;

    passing the message source to a second message display output;

    rendering the message in the second message display;

    combining a base Uniform Resource Locator (URL) and a relative URL into a full URL;

    passing the full URL to be processed to a protocol handler; and

    specifying a security policy setting, wherein the processing of the elements by the protocol handler is in accordance with the security policy setting.

(emphasis added). None of the references of record disclose such a method. To anticipate a claim, each and every element set forth in the claim must be found in a single prior art reference. M.P.E.P. § 2131. But Bruce fails to teach each and every element of this claim.

As argued above with respect to claim 17, there is no teaching of grouping one or more elements within the rendered message into security level groups. As such, claim 26 is submitted as patentable for the same reasons as set forth above with respect to claim 17.

In addition, there is no teaching of combining a base Uniform Resource Locator (URL) and a relative URL into a full URL in Bruce. The teaching of Bruce noted by the Office (pages 16-20) teaches only that both domain and site filtering may be specified with wildcards. But Applicants find no specific reference in Bruce for combining a base Uniform Resource Locator (URL) and a relative URL into a full URL. Applicants request that the Office indicate a particular portion in Bruce that teaches this specific claim element.

In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 26. Claims 27-30, which depend directly or indirectly from claim 26, are submitted as patentable for the same reasons as set forth above with respect to claim 26.

If the Office maintains the rejection of the present claim, Applicants request the courtesy of a phone call to the undersigned at (314) 231-5400.

CONCLUSION

It is felt that a full and complete response has been made to the Office action and, as such, places the application in condition for allowance. Such allowance is hereby respectfully requested. Although the prior art made of record and not relied upon may be considered pertinent to the disclosure, none of these references anticipates or makes obvious the recited invention. If the Examiner feels, for any reason, that a personal interview will expedite the prosecution of this application, he is invited to telephone the undersigned.

The Applicants wish to expedite prosecution of this application. If the Examiner deems the claims as amended to not be in condition for allowance, the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the claims in condition for allowance.

Applicants do not believe that a fee is due in connection with this response. If, however, the Commissioner determines that a fee is due, he is authorized to charge Deposit Account No. 19-1345.

Respectfully submitted,

Brian P. Klein, Reg. No. 44,837
SENNIGER POWERS
One Metropolitan Square, 16th Floor
St. Louis, Missouri 63102
(314) 231-5400

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